

Thank you for the opportunity to become involved in the update of this legislation, which aims at our common goal of increasing water conservation in all California landscapes.

I have the following comments to make on the ordinance revisions:

1. Applicability – The proposed threshold when the ordinance applies is much lower for new landscape projects at 500 sq. feet. This entails additional plan checking and record keeping by landscape staff at the City which is not covered in the existing fee structure, an unfunded mandate in other words. A 1000 s.f. threshold would be a lower level than at present but would still enable a small business to have a small planter in front of a property without extensive approval procedures.
2. Irrigation Efficiency – 0.85 for residential and 0.92 for non-residential, while desirable, appears to be too high to be achievable.
3. Plans approved prior to the approval date of the new ordinance – it is assumed that these plans will be “grandfathered” in .

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